Workgroup Consultation Response Proforma

**GC0154:**

**Incorporation of interconnector ramping requirements into the Grid Code as per SOGL Article 119**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@nationalgrideso.com by **5pm** on **03 August 2023**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Catia Gomes catia.gomes@nationalgrideso.com or grid.code@nationalgrideso.com

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| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |
| **Which best describes your organisation?** | [ ] Consumer body[ ] Demand[ ] Distribution Network Operator[ ] Generator[ ] Industry body | [ ] Interconnector[ ] Storage[ ] Supplier[ ] Transmission Owner[ ] Virtual Lead Party[ ] Other |

**I wish my response to be:**

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| (Please mark the relevant box) | [ ] Non-Confidential | [ ] Confidential |

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);*
3. *Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;*
4. *To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**For reference, (for consultation questions 5 & 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:**

1. *fostering effective competition, non-discrimination and transparency in balancing markets;*
2. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
3. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
4. *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
5. *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
6. *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
7. *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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| **What is the EBR?** |
| The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe’s security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem. |

**Please express your views in the right-hand side of the table below, including your rationale.**

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| **Standard Workgroup Consultation questions** |
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: |
| Original | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| WA(G)CM1 | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 5 | Do you agree with the Workgroup’s assessment that GC0154 does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?  | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 6 | Do you have any comments on the impact of GC0154 on the EBR Objectives? | [ ] Yes[ ] No |
| Click or tap here to enter text. |

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| **Specific Workgroup Consultation questions** |
| 7 | Does the Original proposal or the alternative impact EU TSOs?  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 8 | Has there been sufficient effort taken to seek and obtain European engagement? Other- if other what else could have been done? | [ ] Yes[ ] NoClick or tap here to enter text. |
| 9 | Does the Original proposal / alternative allow for GB to reach its net zero targets?  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 10 | Do you believe the Original proposal or alternative impacts the interconnector business model? (Please consider any commercial and operational impacts)  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 11 | Does the Original proposal / alternative meet the requirements of Ofgem’s August 2019 decision on the implementation of the SOGL? (Check if this is incorporated in grid code objectives) | [ ] Yes[ ] NoClick or tap here to enter text. |
| 12 | Do you believe that the Original/alternative solves the operational challenges faced by the ESO as a result of fast simultaneous interconnector ramping?  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 13 | Do you believe the Original proposal or alternative proposal/s impacts or is impacted by the EU 15 MTU change?  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 14 | Do have any comments on the reliability of the CBA conducted by Baringa? If available, please provide any analysis supporting your response.  | [ ] Yes[ ] NoClick or tap here to enter text. |
| 15 | Are there any considerations for implementation on the Original proposal /alternative proposals? (e.g., IT impacts or considerations)  | [ ] Yes[ ] NoClick or tap here to enter text. |